

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RICHARD SIERRA; VERONICA GOOCH;	)	
ROLAND SIERRA; LUCIA LLERAS DE	)	
LABRADA; PRISCILLA LLERAS-BUSH, in her	)	
personal capacity and as Personal Representative	)	
of the ESTATE OF OLGA ROMAGOSA; and	)	
SUZETTE NICOLE NEYRA HENDRICK, as	)	C.A. No. 22-366-JLH-CJB
personal representative of the estate of ANGELA	)	(Consolidated Action)
ROMAGOSA FERNANDEZ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
TRAFIGURA TRADING, LLC, and	)	
TRAFIGURA GROUP PTE LTD,	)	
	)	
Defendants.	)	

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**DEFENDANTS TRAFIGURA TRADING LLC AND TRAFIGURA GROUP PTE. LTD'S  
MOTION TO STAY DISCOVERY**

Defendants Trafigura Trading LLC and Trafigura Group Pte. Ltd. move to stay this action pending the outcome of the dispositive motions currently before the Court (D.I. 39 and 41) and any appeals that may follow the Court's rulings the same. The grounds supporting this motion are fully set forth in the letter brief filed contemporaneously herewith. A proposed order is attached.

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March 6, 2024

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**RULE 7.1.1 CERTIFICATION**

Pursuant to D. Del. LR 7.1.1 counsel for the parties met and conferred regarding the relief sought in Plaintiff's Motion to Stay Discovery, including verbally by teleconference with Delaware and lead counsel, and the parties were unable to reach an agreement on the relief sought therein.

/s/ Michael J. Flynn

Michael J. Flynn (#5333)

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RICHARD SIERRA; VERONICA GOOCH; )  
ROLAND SIERRA; LUCIA LLERAS DE )  
LABRADA; PRISCILLA LLERAS-BUSH, in )  
her personal capacity and as Personal )  
Representative of the ESTATE OF OLGA )  
ROMAGOSA; and SUZETTE NICOLE NEYRA )  
HENDRICK, as personal representative of the )  
estate of ANGELA ROMAGOSA )  
FERNANDEZ, )

Plaintiffs, )

v. )

TRAFIGURA TRADING, LLC, and )  
TRAFIGURA GROUP PTE LTD, )

Defendants. )

C.A. No. 22-366-JLH-CJB  
(Consolidated Action)

**[PROPOSED] ORDER ON DEFENDANTS' MOTION TO STAY DISCOVERY**

The Court, having considered the motion by Defendants Trafigura Trading LLC and Trafigura Group Pte. Ltd. to stay discovery in this action pending the outcome of Defendants' dispositive motions (D.I. 39, 41), and the briefing and arguments related thereto, finds that the motion should be GRANTED.

IT IS HEREBY ORDERED that all discovery in this case is STAYED pending resolution of Trafigura Trading, LLC's Motion to Dismiss (D.I. 39) and Defendant Trafigura Group Pte. Ltd.'s Motion to Dismiss (D.I. 41) including resolution of all appeals on those motions.

Date: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Christopher J. Burke

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on March 6, 2024, upon the following in the manner indicated:

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